



SF Environment

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A Department of the City and County of San Francisco

London Breed
Mayor

Deborah O. Raphael
Director

Department of Toxic Substance Control (DTSC)
Attn: Safer Consumer Products (SCP) Program
1001 I Street
Sacramento, CA 95814

Submitted via online portal at <https://calsafer.dtsc.ca.gov/>

Re: Comments on DTSC Proposed Listing of Carpets and Rugs Containing Perfluoroalkyl or Polyfluoroalkyl Substances as a Priority Product.

Dear Dr. Williams:

Thank you for the opportunity to comment on DTSC's proposed regulation to list carpets and rugs containing perfluoroalkyl or polyfluoroalkyl substances (PFASs) as a Priority Product. We applaud DTSC for taking this step to protect public and environmental health and are especially supportive of DTSC naming the entire class of PFASs. While we support DTSC's proposal, **we also ask that you consider broadening this proposed regulation to include artificial turf.**

The San Francisco Department of the Environment has long championed policies and programs that reduce human exposures to toxic chemicals and curb improper disposal of products containing them. Since 2016, we have been actively addressing PFASs in consumer products. During that time, we have prohibited PFASs in disposable food service ware Citywide; developed specifications for City purchases of upholstered furniture that eliminate PFAS-containing stain resistance treatments; are currently working with the San Francisco Fire Department to eliminate the use of PFASs in firefighting foam; and have prohibited City purchases of carpet and rugs containing PFASs.

Through our work on PFASs, **we have discovered that artificial turf is likely to be produced with PFASs¹ and, for the following reasons, believe it makes sense for DTSC to include artificial turf in the scope of carpet and rugs:**

- Like carpet, artificial turf falls under the scope of DTSC's Work Plan description of building products in that it is "permanently or semi-permanently fixed in place" and "designed to remain in place once installed."
- While more commonly installed outdoors, artificial turf may also be installed indoors. Artificial grass may be found inside homes, daycare settings and schools, as well as

¹ Ecology Center and Public Employees for Environmental Responsibility, 2019. "'Toxic 'Forever Chemicals' Infest Artificial Turf," available at <https://www.ecocenter.org/toxic-forever-chemicals-infest-artificial-turf>

indoor sports fields/courts at recreational facilities. Whether indoors or outdoors, children and adults are likely to come into direct contact with artificial turf as they play.

- The general composition of carpet and artificial turf is similar in that they commonly have a primary backing, a secondary backing and a fiber layer. Materials used in both types of products can be quite similar, such as polyvinyl chloride, polypropylene, nylon and polyurethane. Technological advances to eliminate PFASs made by manufacturers in either sector may extend to the other. In addition, as we note below, the manufacturing facilities may be one and the same.
- Like carpet, artificial turf is produced in large rolls, smaller area “rugs” and tiles.
- Several artificial turf companies are located in Dalton and Calhoun, Georgia, a hub for carpet manufacturing in this country. Upon further investigation of this apparent coincidence, we were told by one artificial turf company that it often contracts with carpet manufacturers to assemble their turf products. In addition, at least one carpet manufacturer also produces artificial turf under its own brand. While many carpet manufacturers have begun to eliminate their use of PFAS in their products, we are unaware of any claims by artificial turf manufacturers to do the same. Since there may be a close relationship between turf and carpet manufacturers, perhaps turf companies can learn from advances made in carpet technology.
- Like with carpet and rugs, the use of PFASs in the production of artificial turf exposes workers to PFASs during manufacture, installation and disposal.
- In terms of disposal, artificial turf poses many of the same problems as carpet – they both result in a significant waste stream in terms of volume and weight. Often made of the same materials, carpet and turf are difficult to recycle, and if recycled introduce toxic chemicals into new recycled content products. Both may also result in a persistent source of PFAS into the environment whether managed at recycling facilities or landfills. To advance a circular economy, DTSC must prioritize eliminating toxic chemicals from products that are manufactured and discarded at the large scale of carpet and turf.
- Finally, whether installed indoors or outdoors, artificial turf fields are recommended to be cleaned at least once a year with water and surfactants, potentially releasing persistent PFASs to stormwater and wastewater systems and ultimately their receiving waters.

Once again, we appreciate the opportunity to comment on DTSC's proposed action. Should you have any questions, please do not hesitate to contact me at 415-355-3758 or jen.jackson@sfgov.org.

Sincerely,



Jen Jackson

Toxics Reduction & Healthy Ecosystems Program Manager